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Attorneys for Defendants NATIONSTAR MORTGAGE, LLC,
XOME SETTLEMENT SERVICES LLC, AND QUANTARIUM, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

COLLATERAL ANALYTICS, LLC,

Plaintiff,

v.

NATIONSTAR MORTGAGE LLC,
XOME SETTLEMENT SERVICES LLC, and
QUANTARIUM, LLC,

Defendants.

Case No. 3:18-cv-00019-RS

**THE PARTIES' STIPULATION AND
~~[PROPOSED]~~ ORDER REGARDING
DISCOVERY OF EMAILS AND
ATTACHMENTS**

Ctrm: 3, 17th Floor
Judge: Honorable Richard Seeborg

1 Pursuant to the Court's minute order following the initial case management conference held in
2 this case on April 19, 2018, ECF No. 53, Plaintiff Collateral Analytics, LLC and Defendants Nationstar
3 Mortgage LLC, Xome Settlement Services, LLC, and Quantarium, LLC (together, the "Parties") held a
4 further meet and confer regarding discovery of emails and their attachments. The Parties respectfully
5 submit the following protocol to limit the discovery of emails and their attachments in this case:

6 1. Within twenty-one (21) days from the service of a request for production ("RFP") for
7 emails and their attachments, the Parties shall meet and confer to develop a list of custodians and search
8 terms that the Responding Party will use to search for, review, and produce any emails and attachments
9 responsive to the RFP.

10 2. At least seven (7) days before the meet and confer the Propounding Party shall serve a
11 proposed list of custodians and search terms for each of the Propounding Party's RFPs that requests
12 emails and their attachments.

13 3. At the meet and confer, the Responding Party shall be prepared to discuss the number of
14 emails that contain each of the search terms by custodian (*i.e.*, the hit counts) identified in the
15 Propounding Party's proposed list. The Parties agree to negotiate the list of search terms and custodians
16 in good faith, taking into account the hit counts for the search terms and custodians and the subject matter
17 of the RFP.

18 4. Nothing in this protocol shall be interpreted to require disclosure of irrelevant information
19 or relevant information protected by the attorney-client privilege, work-product doctrine, or any other
20 applicable privilege or immunity. The Parties do not waive any objections as to the production,
21 discoverability, admissibility, or confidentiality of emails and their attachments, and reserve all rights to
22 seek appropriate relief from the Court.

23 Dated: April 27, 2018

DURIE TANGRI LLP

25 By: /s/ Lauren E. Kapsky
26 LAUREN E. KAPSKY

27 Attorney for Plaintiff
28 COLLATERAL ANALYTICS, LLC

1 Dated: April 27, 2018

MCKOOL SMITH, P.C.

2
3 By: /s/ Ashley Moore
ASHLEY MOORE

4 Attorney for Defendants NATIONSTAR
5 MORTGAGE, LLC, XOME SETTLEMENT
6 SERVICES LLC, AND QUANTARIUM, LLC

FILER'S ATTESTATION

7 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Lauren E. Kapsky, attest that concurrence
8 in the filing of this document has been obtained.


9 Dated: April 27, 2018

/s/ Lauren E. Kapsky
LAUREN E. KAPSKY

10
11 **~~PROPOSED~~ ORDER**

12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13 Dated: 4/30/18

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15 RICHARD SEEBORG
16 UNITED STATES DISTRICT JUDGE
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